

FALL 2022

**NORTH DOUGLAS NEIGHBORHOOD ASSOCIATION  
SECOND CROSSING COMMITTEE**

**COMMENTS ON DRAFT PURPOSE AND NEED STATEMENT – PEL STUDY**

The Second Crossing Committee of the North Douglas Neighborhood Association (NDNA) has reviewed the draft JD North Crossing PEL Study Purpose and Need Statement, and has the following comments.

As an initial matter, NDNA encourages DOWL and DOTPF to review the Joint Statement of Mendenhall Wetlands Stakeholder Groups on the North Douglas Crossing Project, which was developed in 2007 in response to the Sheinberg Report. (This statement is appended to these comments.) We previously sent this statement to you, along with other documents prepared by our committee, and believe that many of the concerns expressed are germane to the PEL Study and the draft purpose and need statement.

NDNA was actively involved in prior efforts undertaken to identify a location for a second crossing of Gastineau Channel north of the existing bridge, in particular the studies prepared in 2005 for DOTPF by HDR Alaska, Inc., and in 2007 by Sheinberg Associates. As indicated at that time, based on the results of a survey NDNA conducted of all North Douglas property owners, which demonstrated a wide diversity of views, we did not take a position whether a crossing should be constructed and, if so, where. NDNA instead emphasized that as the neighborhood that will be most directly affected by a crossing, the CBJ should commit to an area planning process for North Douglas under the framework of its comprehensive plan. This request was endorsed in the Sheinberg Report but no further progress has been made toward that end. NDNA reiterates its position regarding the need for a North Douglas area planning process.

Consistent with that position, NDNA recommends that the PEL purpose and need statement be amended to add as an “additional goal” that any identified crossing alternatives should avoid/minimize/mitigate adverse impacts on the North Douglas neighborhood. This is the same standard the need statement articulates for impacts on the natural environment (in the third bullet point) but should be stated separately for impacts to our neighborhood. We further contend that it will be necessary for DOWL and DOTPF to engage directly with NDNA and other North Douglas groups (e.g., Bonnie Brae Neighborhood Association and residents of Bayview and beyond) in the process of identifying alternative locations for a crossing.

NDNA also believes that the “additional goal” relating to the natural environment should specifically refer to the Mendenhall Wetlands State Game Refuge. Both state and federal law impose significant restrictions on running transportation corridors through wildlife refuges and similar protected lands (commonly called Section 4(f) properties), and the need to “avoid/minimize/mitigate” adverse impacts to the Refuge must be thoroughly addressed in the PEL study process.

The “additional goal” relating to the natural environment should also be expanded in two other respects (1) to recognize the potential impacts of climate change and address how those impacts relate to the stated need for a north crossing, and (2) to encourage comprehensive studies of the wildlife and fishery resources of the upper Fritz Cove area, including the estuarine and nearshore environment of the Mendenhall River delta, Entrance Point, and the waters between Spuhn Island and North Douglas.

Finally, we strongly encourage that the purpose and need statement should reflect a commitment by DOWL and DOTPF of full transparency in the PEL study. This means a thorough presentation of information and data on the cost of a crossing; a detailed analysis of how a crossing would tie in to the North Douglas Highway, including how many properties would be displaced at the terminus; and how traffic in that area and all along the highway would be affected. This information should be made public *before* any crossing alternatives are identified for further study in a NEPA process.

NDNA appreciates the opportunity to comment on the draft purpose and need statement, and looks forward to working with DOWL and DOTPF in the PEL study process.